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April 13, 2023

VIA ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *Martinez v. La Maria Pizzeria Corp. et al.*
Civil Action No. 22-cv-04578-KPF

Your Honor:

We are attorneys for plaintiff in the above-captioned matter, and submit this letter jointly with counsel for defendants 1455 Nepperhan Rest Corp., Laurie Tranquillo, and Albert Tranquillo (together with plaintiff, the “Parties”) to respectfully request a brief extension of the Parties’ deadline to submit the proposed settlement agreement and letter motion for approval. This is the Parties’ first request for an extension.

Pursuant to Your Honor’s order dated March 15, 2023, the Parties were required to submit their settlement agreement and letter motion for approval to the Court on or before April 14, 2023. Since that time, counsel for the Parties have worked in good faith to reduce the terms of the Parties’ settlement to a formal written agreement, which is nearly finalized. The parties respectfully request a brief extension, until April 28, 2022, to provide the parties with sufficient time to review and execute the agreement.

The parties apologize to the Court for the untimeliness of this request. The parties are confident that they will be able to submit the agreement and accompanying Cheeks letter motion to the Court by April 28, 2022.

We thank the Court for its attention to this matter.

Respectfully submitted,
/s/ *Eliseo Cabrera*
Eliseo Cabrera

Application GRANTED.

Dated: April 14, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE